

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PLUMBERS' PENSION FUND, LOCAL 130, U.A.,)
PLUMBERS' WELFARE FUND, LOCAL 130, U.A.,)
THE TRUST FUND FOR APPRENTICE AND)
JOURNEYMAN EDUCATION AND TRAINING,)
LOCAL 130, U.A., PLUMBERS' RETIREMENT)
SAVINGS PLAN FUND, LOCAL 130, U.A., and)
CHICAGO JOURNEYMEN PLUMBERS' LOCAL)
UNION 130, U.A., GROUP LEGAL SERVICES PLAN)
FUND,)

Plaintiffs,

v.

COMMONWEALTH MECHANICAL)
CONTRACTORS CORPORATION,)
an Illinois corporation,)

Defendants.)

Case No.: 14 cv 3585

Judge: Der-Yeghiayan

Magistrate Judge: Schenkier

Agreed Motion for Entry of Agreed Judgment Order

Plaintiffs, by its attorneys, Shane Luedke and Gregorio & Associates, and Defendant, by its attorney, Michael A. O'Brien, move this Honorable Court to enter an Agreed Judgment Order against the Defendant, COMMONWEALTH MECHANICAL CONTRACTORS CORPORATION, and in support states as follows:

1. Plaintiffs filed their Complaint on May 16, 2014 alleging that the Commonwealth Mechanical Contractors Corporation failed to fringe benefits contributions to the Plaintiff Trust Funds.

2. The parties now have reached an agreement to resolve all matters in dispute. Pursuant to agreement, an agreed Judgment will be entered against the defendant, Commonwealth Mechanical Contractors Corporation.

3. Commonwealth Mechanical Contractors Corporation and the Plaintiffs have agreed to have a Judgment entered against Commonwealth Mechanical Contractors Corporation in the total amount of \$173,842.38 representing \$136,718.32 in unpaid fringe benefit contributions for the period 9/1/13 through 6/30/14, \$26,469.56 in liquidated damages and interest for the period 1/1/12 through 6/30/14, and \$10,654.50 in attorney fees which are collectable under the terms of the Collective Bargaining Agreement, Trust Agreements and Federal law (29 U.S.C. Section 1132(g)(2)(b)).

WHEREFORE, Plaintiffs and Defendant, Commonwealth Mechanical Contractors Corporation request that this Court enter an Agreed Judgment Order in the amount of \$173,842.38 against the Defendant, Security Industries, Inc.

By: /s/ Michael A. O'Brien
On behalf of the Defendant

By: /s/ Shane Luedke
On behalf of the Plaintiffs

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